

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D1 Delphine-Georgiana Epure

D2 Leonard Mihaiu

D3 Bobi-Kevin Birzan

D4 Florin Birzan

D5 Marian Cretu

Case: 2:24-mj-30432

Assigned To : Unassigned

Assign. Date : 10/7/2024

Case No. Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 27, 2024 in the county of Oakland and Livingston in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1344

18 U.S.C. § 1349

18 U.S.C. § 1343

18 U.S.C. § 1708

Bank Fraud

Conspiracy to Commit Bank and Wire Fraud

Wire Fraud

Possession of Stolen Mail

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: October 7, 2024City and state: Detroit, Michigan*Complainant's signature*

Todd Ziobro, Postal Inspector (U.S.P.I.S.)

Printed name and title*Judge's signature*

Hon. David R. Gannd, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANTS

I, Todd Ziobro, being duly sworn, hereby depose and state as follows:

INTRODUCTION & AFFIANT BACKGROUND

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been employed with the United States Postal Inspection Service since April 2016, assigned to the Detroit, Michigan Division.

2. I completed the Inspection Service’s Basic Inspector’s Training Academy, a twelve-week training program in Potomac, Maryland, during which I developed investigative skills for investigating a variety of federal criminal offenses, including mail theft, mail fraud, and other financial crimes. Since November of 2019, I have been assigned to the Financial Crimes Team. In this capacity, I am responsible for investigating mail theft and various financial crimes involving the United States mail. I am currently assigned to the Southeast Michigan Cyber Fraud Task Force (SEMCFTF), which consists of members from local Michigan police departments as well as federal law enforcement

agencies. The task force investigates criminal violations of both federal and state fraud laws.

3. During my work experience as a Postal Inspector, I have participated in numerous financial investigations including investigations involving identity theft and credit card fraud. Prior to becoming a U.S. Postal Inspector, I was a United States Customs and Border Protection Officer for seven years.

4. This affidavit is made in support of criminal complaints and arrest warrants for DELPHINE-GEORGIANA EPURE (aka VIRGINIA PETRU), LEONARD MIHAIU (aka MIHAIU LEONARD), BOBI-KEVIN BIRZAN, FLORIN BIRZAN and MARIAN CRETU, for violations of 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud and Wire Fraud), 18 U.S.C. § 1343 (Wire Fraud) and 18 U.S.C. § 1708 (Possession of Stolen Mail), as well as aiding and abetting those violations in violation of 18 U.S.C. § 2.

5. The information contained in this affidavit is based upon my personal knowledge, training and experience, as well as the combined knowledge, training and experience of other law enforcement officers and

agents with whom I have had discussions. It does not set forth all facts known to me in this investigation.

PROBABLE CAUSE

6. On or around July 4, 2024, two individuals, later identified as MARIAN CRETU and BOBI-KEVIN BIRZAN, stole at least two checks from the mailbox of a local church in Plymouth Township, Michigan.

7. CRETU and BOBI-KEVIN BIRZAN drove to the church in a vehicle registered to CRETU and used a long tool with a sticky substance on the end to remove mail from the locked church mailbox. CRETU was seen on surveillance video getting out of the passenger seat of his vehicle and walking to the mailbox while BOBI-KEVIN BIRZAN drove the car.

8. A review of church records confirmed that at least two checks mailed to the church from a FDIC insured financial institution were mailed to the church but never received.

9. In addition, an empty envelope meant to include a check was found on the road near the church.

10. A review of the church's security camera system showed CRETU and BIRZAN returning to the church mailbox at least ten times throughout July and August 2024 in the vehicle registered to CRETU.

11. The two checks stolen by CRETU and BIRZAN on July 4 were later deposited into a bank account at an FDIC-insured institution. The account is held by Individual-1, who had opened the bank account with a foreign passport and driver's license, using an address in Houston, Texas.

12. Law enforcement identified 13 other accounts at the same FDIC-insured bank opened by foreign nationals using the same Houston address. To date, law enforcement has identified checks written to at least 38 churches in the Metro-Detroit area that were stolen and deposited into accounts using the Houston address.

13. ATM surveillance video shows that these deposits, including the July 4 checks mentioned above, were made by Delphine-Georgiana Epure and Leonard Mihaiu on multiple dates in July in Houston, Texas.

14. On August 13, 2024, BOBI-KEVIN BIRZAN and CRETU deposited a check at a financial institution in Farmington Hills, Michigan insured by the FDIC. The check had been written by a resident of

Jackson County and stolen from a funeral home in the Eastern District of Michigan.

15. On September 20, 2024, law enforcement placed a gift card from a national retail chain, inside a white envelope and into the local church's mailbox in Plymouth Township, MI. Surveillance video from the church shows EPURE leaning out of the passenger side of a Ford Escape with a California license plate and using a long tool to reach inside the mailbox to steal the gift card.

16. On September 24, 2024, EPURE and MIHAIU left the hotel in the Metro-Detroit area where they had been staying together and cashed the gift card placed in the church's mailbox. The balance of the purchase was made with a debit card in EPURE's name.

17. EPURE and MIHAIU also traveled to several jewelry shops within the Eastern District of Michigan where they purchased, or attempted to purchase, more than \$10,000 worth of jewelry and gold bars.

18. On September 27, 2024, law enforcement saw Florin BIRZAN and Individual-2, a minor, driving the Ford Escape with the California plate. The Escape drove through 16 church parking lots in Oakland and Livingston Counties, stopping near the mailbox of each church.

19. That same day, law enforcement stopped Florin BIRZAN's car and found stolen mail inside from the churches, including checks.

20. On the same day, EPURE and MAHIU returned to the local church in Plymouth where they once again attempted to steal checks from the mailbox. This time law enforcement was able to stop them and arrested them both. Inside their car were eleven checks in the amount of \$21,546.18 written to numerous churches, \$3,435 in cash, five debit cards in other people's names, two money orders in the amount of \$170.00, and six wire transfer receipts.

CONCLUSION

21. Based on the investigation thus far, including the facts set forth above, your affiant submits that there is probable cause to believe that DELPHINE-GEORGIANA EPURE (aka VIRGINIA PETRU), LEONARD MIHAIU (aka MIHAIU LEONARD), BOBI-KEVIN BIRZAN, FLORIN BIRZAN and MARIAN CRETU violated 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud and Wire Fraud), 18 U.S.C. § 1343 (Wire Fraud), and 18 U.S.C. § 1708 (Possession of Stolen Mail).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Todd Ziobro", written over a horizontal line.

Todd Ziobro, Postal Inspector
U.S. Postal Inspection Service

Sworn to before me in my presence
and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", written over a horizontal line.

Hon. David R. Grand
United States Magistrate Judge

October 7, 2024